

Comment on AOR 2011-17

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OFFICE OF GENERAL
COUNSEL

Cynthia L. Beverly

Chairman

Federal Election Commission

999 E Street, NW

Washington, DC 20463

(800) 424-9530

E-mail:

Re: Grant permission to use campaign funds for security upgrades

Dear Chairman:

Grant Rep. Gabrielle Giffords (D-Ariz.) permission to use campaign funds for security upgrades at the congresswoman's home.

The security updates would include improved exterior lighting, locks and installation of a "duress alarm button," according to the letter, which notes that the measures were recommended by Capitol Police.

The Giffords campaign says the security measures have an estimated cost of \$2,209 and are "not intended to increase the value of the property."

In April, the FEC approved using campaign funds to install a security system at the home of Rep. Lee Terry (R-Neb.) after Capitol Police recommended the upgrades.

If the FEC concludes that the expenses would not exist apart from Giffords's congressional position and duties, the security expenses do not count as personal use under federal law.

Thank you for the opportunity to bring these remarks to your attention.

Yours sincerely,

Robert E. Rutkowski

Robert E. Rutkowski

cc:

House Minority Leadership

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